

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE**

**IN RE: STACIE DENISE BRADLEY  
275 BILL STEWART BLVD  
LA VERGNE, TN 37086**

**Debtor:  
SSN: xxx-xx-3294**

**CASE NO. 3:19-bk-03007  
CHAPTER 13  
JUDGE MASHBURN**

**STACIE DENISE BRADLEY  
Plaintiff**

**V.  
BRIDGECREST CREDIT  
Defendant**

**COMPLAINT FOR TURNOVER**

Plaintiff respectfully represents:

1. This is a request for the immediate turnover of the 2014 Chrysler 300 and all contents from the vehicle to the Debtor.
2. Notice of this Complaint was sent to: BRIDGECREST, 7300 E HAMPTON AVE STE 100, MESA, AZ 85209-0000, by first class mail, and by Facsimile to 1-(866) -327-8201.
3. The Complaint should be set for hearing on Wednesday, May 22, 2019, at 8:30 AM at Courtroom 1, 2nd Floor Customs House, 701 Broadway- Nashville- TN 37203.
4. The creditor was given notice of the Bankruptcy filing.
5. This adversary proceeding arises out of Plaintiff's case under Chapter 13 of Title 11, Case No. 3:19-03007, now pending in the Honorable Court. This Court has jurisdiction over this adversary proceeding pursuant to 28 U.S.C. Section 157,1334 and 11 U.S.C. Section 362.
6. The Plaintiff filed a voluntary petition under Chapter 13 of the Bankruptcy Code on May 10, 2019.
7. Defendant is a secured creditor was listed in the Chapter 13 petition.

8. Defendant had Plaintiff's car repossessed pre-petition. Plaintiff's Counsel contacted Defendant multiple times on May 10, 2019, for a turnover of the vehicle and the defendant has been non-responsive. Plaintiff has insurance which was provided to the Creditor on May 10, 2019 at 11:47am.
9. Defendant has displayed an unwillingness to return the vehicle to Plaintiff.
10. The car is necessary for an effective reorganization under Chapter 13.

WHEREFORE, Plaintiffs pray:

1. That the complaint be filed and served upon Defendant according to law.
2. That Defendant be ordered to turn over the 2014 Chrysler 300 to the Debtor.
3. For general relief.

Respectfully Submitted,

/S/Mark Podis  
Mark Podis #012216  
Attorney for Plaintiffs  
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Nashville, TN 37217  
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Email – podisbankruptcy@aol.com

#### **CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing Complaint has been delivered to the US Trustee for the Middle District of Tennessee, 701 Broadway, 318 Customs House, Nashville, TN 37203 delivered to the Chapter 13 Trustee, PO Box 340019, Nashville, TN 37203-0019, mailed to the Debtor, Stacie Bradley, 275 Bill Stewart Blvd, mailed to BRIDGECREST, 7300 E HAMPTON AVE STE 100, MESA, AZ 85209-0000, and Facsimile to 1-(866) -327-8201, on this May 10, 2019.

/S/Mark Podis  
Mark Podis